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ATTORNEY AND COUNSELOR AT LAW

December 9, 2016

VIA ECF

Honorable Michael Hammer, U.S.M.J
United States District Court
2:15-cv-05530-ES-MAH HA v. BAUMGART CAFE OF LIVINGSTON

Your Honor,

Along with John Troy, I represent plaintiffs in the above referenced action. I am writing to Your Honor today because on November 21, 2016 I was forced to leave the Country due to a family emergency in Mexico City. I have attached a copy of my itinerary as Exhibit (A).

Plaintiffs were to file their motion for collective action on that week on November 23rd but due to my family emergency, which is still ongoing, I was unable to file until today.

Plaintiffs respectfully request that the Court accept our filing toady of the motion for Conditional Certification and that the deadlines be re-set as follows:

- 1) Plaintiffs motion for Conditional Certification Filed December 9th, 2016
- 2) Defendant's opposition filed by December 23rd.
- 3) Plaintiff's reply filed by January 6th, 2017.

Defense counsel has been notified of the facts above.

Respectfully,

Lina M. Franco, Esq.

